

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case Number 24-cv-21050-CMA

PRESIDENT DONALD J. TRUMP, an
individual,

Plaintiff,

v.

AMERICAN BROADCASTING COMPANIES,
INC., a Delaware corporation, ABC NEWS,
INC., a Delaware corporation, and GEORGE
STEPHANOPOULOS, an individual,

Defendants.

**JOINT MOTION FOR AN EXTENSION OF TIME
FOR DISCOVERY AND TRIAL DEADLINES**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendants the American Broadcasting Companies, Inc. and ABC News, Inc., George Stephanopoulos (collectively, “Defendants”) and Plaintiff move this Court for an extension of time for all trial deadlines previously set in the case (Dkt. No. 19)¹, and approximately corresponding extensions for all pre-trial deadlines, as set forth below.

Event	Current Deadline	Requested New Deadline
Parties exchange expert witness summaries or reports	November 12, 2024	January 15, 2025
Parties exchange rebuttal expert witness summaries or reports	November 25, 2024	February 14, 2025

¹ Pursuant to the Court’s current Scheduling Order, the Parties are permitted to alter certain internal discovery deadlines by agreement. *See* Dkt. No. 19 at f.n. 1. However, as explained below, the Parties request this extension from the Court to provide more time to conduct discovery given the unique circumstances surrounding this case.

Discovery Deadline	December 9, 2024	February 28, 2025
Expert Discovery Deadline	December 9, 2024	February 28, 2025
Mediation Deadline	December 16, 2024	March 4, 2025
Pre-trial Motions and <i>Daubert</i> Deadline	December 24, 2024	March 14, 2025
In Limine Motions Deadline	January 21, 2025	March 24, 2025
Pretrial Stipulation DDL	January 21, 2025	March 24, 2025
Calendar Call	April 1, 2025 at 9:00 AM	June 2, 2025 at 9:00 AM
Jury Trial	April 7, 2025	June 9, 2025

1. Federal Rule of Civil Procedure 6(b) provides that the Court, for good cause shown, may order a period of time enlarged if a request is made prior to the expiration of the period originally prescribed. Local Rule 7.6 provides that the Court may grant a continuance of a trial or hearing if supported by an affidavit demonstrating good cause.

2. The Parties request that the Court extend all trial deadlines currently pending in the case as described above.

3. The Jewish Passover holiday is April 12-20, 2025. Defendants' lead counsel, Nathan Siegel, would like to travel to Israel with his family to celebrate the holiday there because his son will be attending a student program in Israel next semester. Mr. Siegel was currently planning to travel April 5-23, and at a minimum would need to travel several days before the holiday begins considering travel time, time zone differences, and the potential for travel disruptions to the Middle East. *See Declaration of Nathan Siegel.* For that reason alone, Defendants respectfully request that the trial date be continued to a period materially after the Passover holiday. Plaintiff agrees this request is appropriate to accommodate counsels' ability to observe this religious holiday with this family.

4. In addition, undersigned counsel, Elizabeth McNamara, has another trial set for April 22, 2025, in the Southern District of Georgia, that is expected to last approximately three weeks. *See Declaration of Elizabeth McNamara.* The Parties therefore agree that the requested extension would reasonably accommodate both Mr. Siegel's ability to celebrate Passover as his

family has planned and Ms. McNamara's trial schedule. Under the proposed schedule, pre-trial deadlines would largely expire shortly before Passover begins, and trial deadlines would commence approximately six weeks after the holiday ends.

5. In addition, since this Court's Order denying Defendants' motion to dismiss, the Parties have been conferring cooperatively concerning discovery matters. Recognizing the unique challenges presented by conducting discovery during the course of a Presidential campaign, in a case which includes both a candidate and a major news organization covering the campaign, the Parties agreed that depositions should take place as soon as practicable after election day.

6. However, the Parties also agreed that rather than seek to temporarily stay or administratively close the case entirely, they would endeavor to advance the case by conducting any discovery they mutually agreed would be practical to accomplish. Thus, the parties have been proceeding diligently, including exchanging requests for and certain responses to document production and interrogatories, initial disclosures, serving certain third-party subpoenas, and where possible scheduling some tentative dates for depositions post-election. The Parties are also submitting a Joint Motion for a Protective Order to govern the future progress of discovery, concurrent with this motion.

7. Thus, the Parties submit that good cause exists for the requested extension of pre-trial deadlines to ensure that this action may be fully and adequately litigated in anticipation of presenting summary judgment motions and any trial. Moreover, given that there is independently good cause to continue the trial deadlines, such an extension would not impede the progress of the case.

8. Accordingly, the Parties respectfully request this Court enter an order granting the new deadlines above.

9. The Parties submit that they have demonstrated good cause to extend the deadlines as requested. This is the first extension request made by any party with respect to any discovery or trial deadlines, and is timely made in good faith and not otherwise interposed for the purposes of harassment or delay.

LOCAL RULE 7.1 CERTIFICATION

10. Undersigned counsel certify that Nathan Siegel, counsel for Defendants conferred with Alejandro Brito, Plaintiff's counsel on several occasions during November 1-11, 2024 and the parties reached agreement regarding the all the relief sought in this motion.

WHEREFORE, the Parties respectfully request this Court enter an order setting the discovery and trial schedule as set forth above.

Dated: November 12, 2024

Respectfully Submitted,

PODHURST ORSECK, P.A.

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